

EXHIBIT B

**Documentation of revisions to the backup materials of the May 25, 2012 Rebuttal
Expert Report of Matthew E. Raiff, Ph.D. concerning updates to overcharge
calculations**
February 29, 2016

Below is documentation for updates made to the backup materials of the May 25, 2012 Raiff Rebuttal Expert Report. In summary, a single line of code was updated in three of the six Stata programs that calculates damages. The updated code carries through two additional fields (billto_region and shipto_region), both of which have previously been disclosed as part of the combined Defendant sales database, to the final damages output file. The calculation of damages remains unchanged. Once the updates outlined below are completed, the Stata programs within the “Damage model\Baseline with more fields\Scripts” folder of the May 25, 2012 Raiff Rebuttal Expert Report backup materials.

- File “Prepare data for client model more_fields.do”
 - In line 57, replace the text “keep billto_city” with “keep billto_region shipto_region billto_city”
- File “Damage calculation more_fields.do”
 - In line 114, replace the text “keep billto_city” with “keep billto_region shipto_region billto_city”
- File “Combine output files more_fields.do”
 - In line 20, replace the text “outexcel billto_city” with “outexcel billto_region shipto_region billto_city”

Once the backup materials have been updated, the withdrawn purchases can be identified in the resulting output file using the following methods:

- Carpenter non-Polyols purchases
 - Purchases with a value of "ARCOL POLYOL GP3000", "ARCOL POLYOL GP3006", or "PLYPRPYLNGYLC" within field “std_product_name.”
- Purchases not involving the U.S.
 - Purchases with a value of “BRAZIL” within field “shipto_city.”
 - Purchases that do not have a value of “USA” in either the “shipto_region” field or the “billto_region” field.